

REMARKS

Reconsideration and withdrawal of the rejection of claim 14 as being anticipated under 35 U.S.C. 102(b) over the Davidson et al '033 patent are requested. The Examiner asserts that Davidson teaches a polyvinyl alcohol having photo cross-linkable groups attached thereto wherein the groups are styryl pyridinium and acrylate groups "with the proviso that the groups are not derived from [(4-(2-acryloyloxyethoxy) benzaldehyde and 4-(4-formylphenylethenyl)-1-methylpyridinium methosulfate or 4-(2-acryloyloxyethoxy) benzaldehyde and 1-(3-ethoxycarbonylpropyl)-4-(2-(4'-formylphenyl)ethenyl]pyridinium bromide. The Examiner refers to column 9/line 25 with respect to the styryl pyridinium groups and column 9, line 27 for the acrylate groups. For the proviso, the Examiner refers to column 9, lines 25-27).

It is submitted that this rejection is improper because the '033 patent does not contain any information which discloses or suggests the stated proviso. Rather, looking at column 9, lines 25-27, a listing of specific compounds in a specific formulation is set forth. In particular, the recipe calls for 4-(4- formylphenyl ethenyl)-1-methylpyridinium methosulfate (0.47 grams) and 4-(2-acryloyloxyethoxy) benzaldehyde (1 gram). Clearly, this is the teaching that the styryl pyridinium groups and acrylate groups are in fact derived from the combination of the particular benzaldehyde and methosulfate which is contrary to the present claims. Not only is this not a disclosure of what is recited in claim 14, it is the opposite of the disclosure and requirement of the proviso in claim 14. Accordingly, this rejection is untenable and should be withdrawn.

Reconsideration and withdrawal of the rejection of claims 1 through 13 and 17 through 19 as being obvious over the combination of Davidson et al '033 in view of Figov '001 are also requested. The Examiner relies on Davidson's teaching in "ink" comprising water, referring to column 4, lines 57-62 and a polymer having a plurality of 1, 2-and/or 1, 3-diol groups along the polymer backbone, referring to column 3, lines 64-67) and having pendent photo cross-linkable

groups attached thereto, referring to column 6, lines 22-24). The Examiner recognizes that Davidson teaches the material for use as a coating for a substrate to make a screen printing stencil, referring to column 1, lines 10-37) and further recognizes that this reference does not teach that the ink is an ink-jet ink. The Examiner then relies on Figov as teaching a water soluble polymer with photo cross-linkable groups which may be used as an ink-jet ink.

The Examiner concludes that it would have been obvious to one of ordinary skills in the art at the time the invention was made, to use the material as taught in Davidson as an ink-jet ink as taught in Figov. However, one skilled in this art understands that a composition which is used to make a stencil on a screen printing substrate has no applicability to whether or not such a composition would be suitable as an ink-jet ink. Ink-jet inks must have a relatively low viscosity so that it can be ejected through the nozzles. For example, at page 6, beginning at line 25 of the present application, it is noted that when an ink is formulated as an ink-jet ink, the viscosity is preferably less than 50 mPAS at 25 degrees C. This ink must be injected through nozzles and at a given jetting temperature of about 40 degrees C since the ink would have a much higher viscosity at ambient temperatures. It is further noted that some print heads require especially low viscosity to achieve reliable jetting performance.

To the contrary, compositions for coating on to a screen printing stencil must have sufficient viscosity so as to completely coat the porous stencil and in essence to form a film on the stencil. Thus, as noted at column 1, in the so called "direct" method, the emulsion is coated on to the mesh and dried to give a continuous even film, whereas in the indirect method, it is coated on to a temporary support sheet, exposed, and then adhered to the screen using gentle, even pressure. (Column 1, lines 10-29). Such compositions have relatively high viscosities since they must adhere to a mesh screen and fill the interstitial spaces of the mesh. The

compositions with which the '033 patent are concerned could not possibly be used for ink-jet printing and there is no indication or remote suggestion in the reference that they could be so used. In addition, there is nothing in the '033 patent providing any information which suggests what should be done to such a composition for application for a screen to make it suitable for ink-jet printing and so that it can be ejected through the nozzle of an ink-jet printer. Most certainly, a review of the Figov '001 reference shows that the ink-jet ink compositions disclosed therein must be such viscosities suitable for ink-jet printing and have good absorptive properties when printed on substrate such as paper which are capable of absorbing fluids. This is a completely different type of substrate from that used in screen printing and the compositions of the primary reference would never exhibit the range of viscosity required for ink-jet printing. The two different uses of the compositions of the primary and secondary references are such that one with skill in the art would never equate one composition with the other or remotely believe that one could be used for the other type of printing. This rejection is also untenable and should be withdrawn.

Turning to the rejection of claim 9 which also relies on the '562 patent as defining pentaerythritol triacrylate as a UV reactive monomer, there is nothing in the secondary reference which suggests any way to modify the composition of Davidson '033 to make it suitable for ink-jet printing.

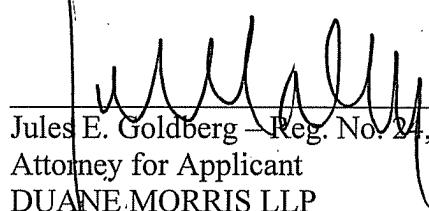
Similarly, with respect to the rejection of Claim 10 over the combination of Davidson and the Fujikawa '044 patent, the secondary reference contains nothing which changes the thrust of the primary reference or makes it more relevant to the invention as recited in Claim 10. This rejection should also be withdrawn.

Turning to the alternative rejection as set forth in paragraph 7 on page 7 of the Office Action, as is clear from the amendment to the claims, the groups are not considered independently from one another, but rather it is the two combination of the two compounds to which the proviso relates. Accordingly, this rejection is moot.

In view of the foregoing, it is submitted that this application is in condition for allowance and favorable reconsideration and notice of allowance are earnestly solicited.

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